

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

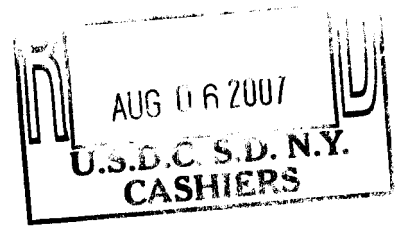
SEATON INSURANCE COMPANY and STONEWALL  
INSURANCE COMPANY,

Plaintiffs

vs.

CAVELL USA INC. f/k/a KEN RANDALL AMERICA, INC.  
f/k/a EASTGATE, INC. and KEN RANDALL, individually

Defendants



*Judge Bertram*

07

CV

7032

**RULE 7.1 STATEMENT**

Pursuant to Federal Rule of Civil Procedure 7.1 [formerly Local General Rule 1.9] and to enable District Judges and Magistrate Judges of the Court to evaluate possible disqualification or recusal, the undersigned counsel for Stonewall Insurance Company ("Stonewall") certifies that the following reflects Stonewall's corporate parents and any publicly held company that owns 10% or more of its stock:

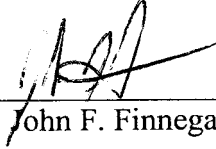
- Stonewall Acquisition Corporation;
- Dukes Place Holdings, L.P., DP Holdings, LLC;
- Greenwich Street Capital Partners II, L.P.;
- Greenwich Street Investments II, LLC; and
- The Travelers Insurance Company.

A copy of Stonewall's organizational chart is attached hereto as Exhibit A and is incorporated by reference herein.

Dated: August 6, 2007

CADWALADER, WICKERSHAM & TAFT LLP

By:



John F. Finnegan (JFF-3336)

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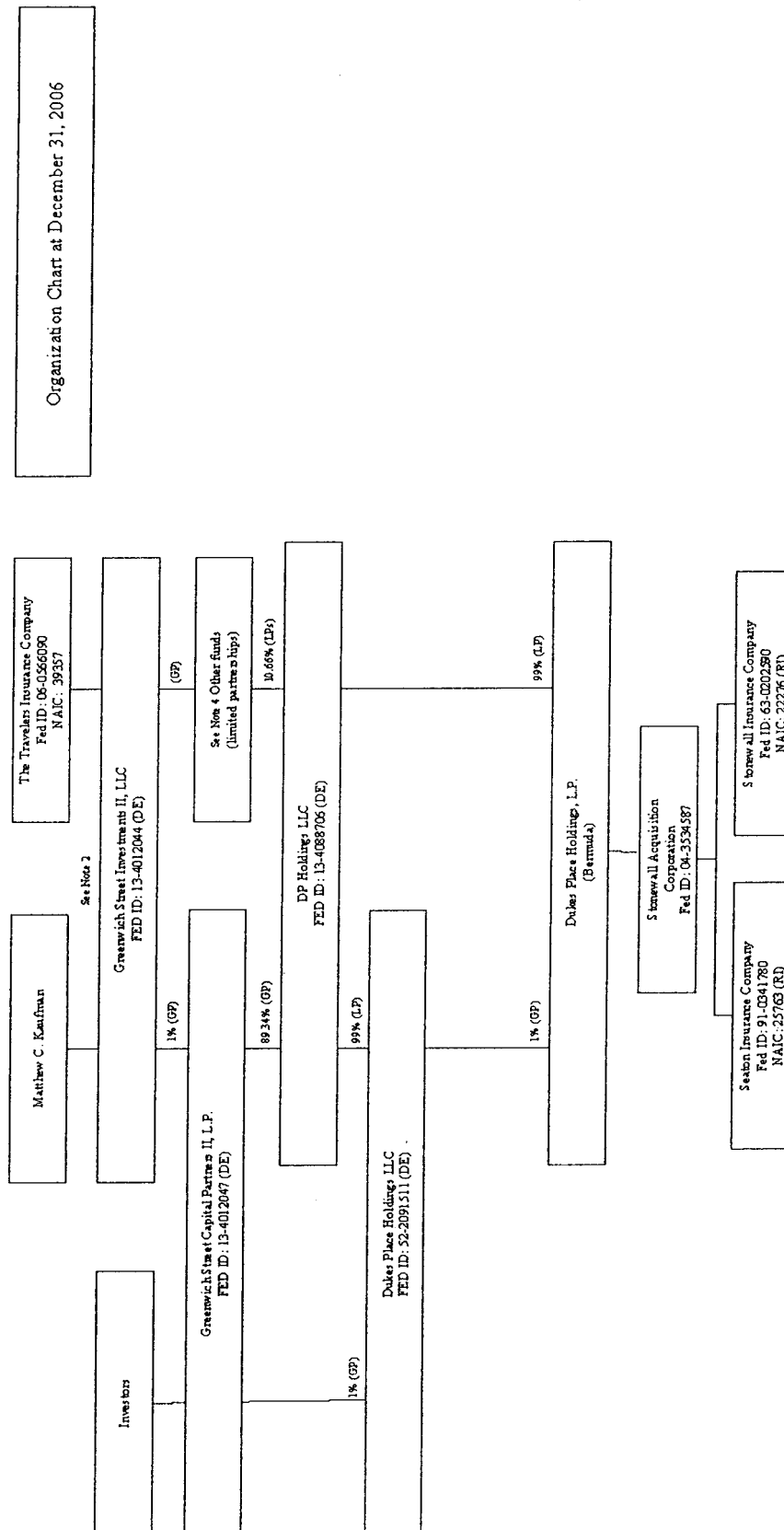
Attorneys for Plaintiffs Seaton Insurance Company  
and Stonewall Insurance Company

Of Counsel:

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**SCHEDULE Y - INFORMATION CONCERNING ACTIVITIES OF INSURER MEMBERS OF A HOLDING COMPANY GROUP**

## PART 1 - ORGANIZATIONAL CHART



Year:

- Notes:
1. All subsidiaries are 100% owned and is otherwise fully paid.
  2. All subsidiaries are owned 100% by the Growth Street Investment Fund Ltd.
  3. All subsidiaries are owned 100% by M. Karmann.
  4. Other subsidiary companies of Growth Holdings Limited have not been listed as they are either not active or they are otherwise immaterial in the context of the overall group of companies.
  5. Except for Growth Street Capital Partners II, L.P. with 89.34% to limited partnership exceeds a 10% investment, the second largest holds 5.33%.